

Remarks

Applicant thanks the Examiner for the indication of claims 1-16 as allowed.

Applicant respectfully traverses the rejection of claims 17-19 as obvious over WO 00/30406.

Document WO 00/30406 discloses a panel for transforming electric current into diffused heat. In this document, it is repeatedly mentioned that the panel provides warmth by means of diffusion of thermal energy provided by the net 85, 86 (see page 1, line 15; page 2, lines 7-8; page 3, line 13; page 4, line 7). It is nowhere mentioned in this document the possibility of using radiating additives in the panel.

In fact, the Examiner acknowledges that the prior art document does not disclose radiating additives. In particular, the Examiner indicated that “while WO-0030406 does not disclose radiating additives, radiating additives are conventional and well known in the art. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have included radiating additives as a means for a more uniform heating.”

The applicant respectfully disagrees. Indeed, in the panel disclosed in WO 00/30406 (see figure 5) the heating nets 85 and 86 are completely embedded in the side 107 of the panel. Departing from the panel disclosed in WO 00/30406, the man with ordinary skill in the art would have added the radiative additives in the material in which this side (i.e. the panel) is made of. This would result in the fact that the heat generated by the nets 85, 86 is directed toward both the environment of the panel, and the foam material for insulation 145.

Furthermore, in the Office Action, the side of the panel wherein the nets are

embedded is equated to the radiation layer of the present invention. However, in the cited document, this side is made of the same material as the other sides of the heating structure. Then, following the reasoning statement of the Office Action, the whole material constituting the panel (and wrapping the foam material) would be intended to transmit heat. Obviously, that is not compatible with the general purpose of a directional heating structure.

Moreover, still following the reasoning statement of the Office Action, incorporating radiating additives in the material the panel is made of would result in a promotion of heat transfer in the side opposite to the nets. Once again, it would result in an effect which is not compatible with the advantages sought by the heating structure of the cited document.

Thus, including radiating additives in the panel disclosed in WO 00/30406, would not have been obvious to the man skilled in the art at the time the invention was made, because this was incompatible with what is sought in this document, that is to say, generating heat only on one side of the panel (see page 7, lines 12-16).

Then, the combination of the teachings of WO 00/30406 and the general knowledge of the man skilled in the art would not lead to the present invention.

The present invention has at least three distinct layers. A first external layer consists in the radiating layer that comprises predominantly radiating additives, a second external layer consists in the thermally insulating layer, and sandwiched between these two external layers, a heating layer comprising an electrical resistor. With the present invention it is possible to include radiating additives in the material the radiating layer is made of, without promoting heat transfer toward the thermally insulating layer.

It should be emphasized, that the heating structure according to the present invention is intended to enable a directional transfer of heat, that is to say, from the heating layer FC to the radiating layer C1. Furthermore, the present invention provides a radiating structure S that generates a soft heating and that does not provoke air mixing (see paragraph 14 of the publication of the present application).

Therefore, the subject matter of claims 17-19 (as amended) is non obvious in view of prior art WO 00/30406.

As a final matter, Applicant notes that the Amendment of October 17, 2005 to claim 8 was apparently only partially entered. In particular, the published application includes the phrase "in which". This phrase was deleted in the just mentioned amendment. An Examiner's Amendment is kindly requested.

In view of the foregoing comments, Applicant respectfully requests the Examiner's reconsideration and allowance of all the claims.

Respectfully submitted,

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